

**ALEXANDER JOHNSON,**

**Plaintiff,**

**v.**

**JH WILSON TRANSPORT, LLC,**  
**ARNOLD FARMS TRUCKING, LLC,**  
**And DAVID GRUBBS,**

**Defendants.**

## MOTION FOR SUMMARY JUDGMENT

Come now the Defendants, through counsel, and pursuant to Rule 56 of the Federal Rules of Civil Procedure move for entry of summary judgment of dismissal as to Defendant Arnold Farms Trucking, LLC.

In support of this Motion, Defendants state the undisputed facts show there is no basis for liability to be asserted against Defendant Arnold Farms Trucking, LLC. The undisputed facts show Arnold Farms Trucking, LLC had leased the vehicle to JH Wilson Transport, LLC before the accident. The trip undertaken at the time of the accident was while the truck was under dispatch from JH Wilson Transport, LLC. The driver of the truck, David Grubbs, was an employee driver of JH Wilson Transport, LLC, at the time of the accident.

There is no genuine issue of material fact. Arnold Farms Trucking, LLC is entitled to judgment as a matter of law. Defendants request this matter be dismissed as to Arnold Farms Trucking, LLC. Defendants request such other relief as they may be entitled.

**FEENEY & MURRAY, P.C.**

By: John Thomas Feeney  
**John Thomas Feeney**  
 BPRN 11482

Attorneys for Defendants  
P. O. Box 198685  
Nashville, Tennessee 37219-8685  
(615) 242-3700

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing has been filed with the Court's ECF filing system and a copy has been forwarded by the ECF system to: postage prepaid to:

Neal Agee, Jr.  
Agee & Tinsley  
406 West Main Street, Suite A  
Lebanon, TN 37087

this the 13th day of March, 2020

John Thomas Feeney  
**John Thomas Feeney**